

ALETHEA O'TOOLE  
1308 E Colorado Blvd., #516  
Pasadena, CA 91106  
Phone Number: (323)286-1018  
Email Address: [a.otoole@live.com](mailto:a.otoole@live.com)  
Plaintiff In Pro Se

RDDJ



N/S

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Alethea C. O'Toole

Plaintiff,

vs.

Nickelodeon Animation Studio, Inc.,  
Nickelodeon Group, Paramount Global,  
ViacomCBS, Inc., National Amusements Inc.,  
Netflix, TajMania Entertainment, Christopher  
M. Savino, Darryl "Scott" Haynes and Does 1-  
500

Defendant(s)

) Case No.: 2:25-cv-04849-ODW-(BFMx)

) SEEKING NATIONWIDE  
RELIEF

)

)

) VERIFIED SECOND  
) AMENDED COMPLAINT  
) FOR RELIEF, REMEDIES,  
) AND DAMAGES CAUSED  
) BY COPYRIGHT  
) INFRINGEMENT,  
) ACCOUNTING,  
) INJUNCTION, AND  
) ADDITIONAL CAUSES OF  
ACTION

)

**JURY TRIAL DEMANDED**

Plaintiff Alethea C. O'Toole alleges as follows:

## I. JURISDICTION

- 1) This is an action for copyright infringement pursuant to the Copyright Act, 17 U.S.C. §101 et seq. together with a claim of unfair competition.
- 2) Plaintiff seeks an accounting and an injunction to prevent Defendants from their continuing conduct in unlawfully violating Plaintiff's rights.

## II. VENUE

- 3) Venue over this action in California is proper in this District pursuant to 28 U.S.C. §1391 U.S. Code Unannotated Title 28 which establishes general venue over judiciary and judicial procedure in an action in any judicial district in the United States.

## III. PARTIES

- 8) **Plaintiff Alethea C. O'Toole:** At all times hereinafter mentioned, Alethea C. O'Toole (herein "Plaintiff") is an individual residing at 1308 E Colorado Blvd. #516, Pasadena, CA 91106. Plaintiff is a talented writer and illustrator. She is the sole author and creator of a number of children's books featuring Plaintiff's text and Plaintiff's numerous original illustrations. Plaintiff's works relevant to the claims herein include "The Pirates of Pizzan" (1998), "Max and Puppy: Max's Birthday" (2002), "Max and Puppy: Puppy's First Snow" (2003), "Muffin

1 Muncher: the Musical” (2004), “Live! With Truly” (2014) and “Westfield” (2014)  
2 (collectively, “the Works”).  
3

4 9) **Defendant Nickelodeon Animation Studio, Inc.:** Upon information and belief, at  
5 all times hereinafter mentioned (herein “Nickelodeon”) is an American pay  
6 television channel specializing in children’s entertainment and a division of  
7 Paramount Global, with its principal place of business as 231 W Olive Ave,  
8 Burbank, CA 91502.  
9  
10

11  
12 10) **Defendant Nickelodeon Group:** Upon information and belief, at all times  
13 hereinafter mentioned, was an affiliate of Nickelodeon providing in-house  
14 animation for Nickelodeon with its principal place of business at 1515 Broadway,  
15 New York, New York.  
16  
17

18 11) **Defendant Paramount Global:** Upon information and belief, at all times  
19 hereinafter mentioned, (herein “Paramount Global”) is an American multinational  
20 mass media and entertainment conglomerate with its principal place of business at  
21 1515 Broadway, New York, New York.  
22  
23

24 12) **Defendant ViacomCBS, Inc.:** Upon information and belief, at all times  
25 hereinafter mentioned (herein “ViacomCBS”) was a Delaware corporation and  
26 since has been acquired by National Amusements. ViacomCBS, Inc., has its  
27 principal place of business at 1515 Broadway, New York, New York.  
28

ViacomCBS holds all copyrights for the credited shows and films umbrellaed under *The Loud House Franchise*.

13) **Defendant National Amusements, Inc.:** Upon information and belief, at all times hereinafter mentioned (herein “National Amusements”) is an American privately owned mass media conglomerate incorporated in Maryland and which owns Paramount Global, ViacomCBS, and Nickelodeon, and with its principal place of business at 846 University Avenue, Norwood, Massachusetts 02062-2631.

14) **Defendant Netflix, Inc.-** Upon information and belief, at all times hereinafter mentioned, (herein “Netflix”) is a California corporation currently located at 121 Albright Way, Los Gatos, California 95032.

15) **Defendant TajMania Entertainment:** Upon information and belief, at all times hereinafter mentioned, TajMania Entertainment (herein “TajMania”) is a partnership formed in 2009 consisting of Larry Juris, Howard Gimple, Samy Laskey, Tom Caggiano, and Emanuel “Manny” Reyes (herein, respectively, “Juris,” “Gimple,” “Laskey,” “Caggiano,” and “Reyes”) with an address of 4475 Henry Hudson Parkway, Bronx, New York 10471, currently doing business at 3950 Blackstone Avenue, Bronx, NY 10471.

16) **Defendant Christopher M. Savino:** Upon information and belief, at all times hereinafter mentioned, Christopher M. Savino (herein “Savino”) currently lives at

1 1008 Queens Lake Trail., Mckinney TX 75071. Savino was credited for creating  
2 the animated series entitled *The Loud House* which airs on Paramount and  
3 Nickelodeon.  
4

- 5  
6 17) **Defendant Darryl “Scott” Haynes:** Upon information and belief, at all times  
7 hereinafter mentioned (herein “Haynes”) is an individual living at 106 S Kings  
8 Road, Apt 301, Los Angeles, CA 90048.  
9

10 **IV. STATEMENT OF FACTS**  
11

- 12 18) “That light we see is burning in my hall. How far that little candle throws his  
13 beams! So shines a good deed in a naughty world. So doth the greater glory dim the  
14 less.” ~ Portia, William Shakespeare, *The Merchant of Venice*  
15

- 16 19) Ms. O’Toole has been writing short stories since she was a child. After she had  
17 her son, Hunter J. O’Toole she began writing down literary works. Today she has  
18 several scripts and short stories copyrighted with the copyright office. More  
19 recently in 2021 she placed two scripts in a 24-hour script writing contest win won.  
20  
21

- 22 20) Plaintiff is a creative writer whose works include *Prince of Pizzan*, *The Muffin*  
23 *Muncher: The Musical*, *Max and Puppy*, *Live! With Truly*, and *Westfield*.  
24

25 Defendants, without Plaintiff’s authorization, permission or consent took  
26 Plaintiff’s copyrightable elements of theme, setting, character, time sequence,  
27 pace, and total concept and feel and other elements which are protectable elements  
28

1 of copyrighted work under the Copyright Act, 17 U.S.C. § 101 et seq. to produce a  
2 series of profitable television programs (starting with *The Loud House* and  
3 subsequent sequels and derivative productions) from which they made millions of  
4 dollars.  
5

6  
7 21) In 1998 the Plaintiff created *Prince of Pizzan*, an illustrated story written and  
8 put down in tangible form for her son the year he was born. It has since been  
9 copyrighted with the U.S. Copyright Office.  
10

11  
12 22) Around 2002 the Plaintiff created *Max and Puppy* from original bedtime stories  
13 she told her son. After encouragement from her son's father she began writing the  
14 stories down. The Plaintiff has a copyright application on file with the U.S.  
15 Copyright Office.  
16

17  
18 23) From 2003-2007 the Plaintiff worked diligently to earn a double degree in  
19 Business Administration and Theatre Arts. In 2004 while attending the University  
20 of Hawaii-Hilo, the Plaintiff obtained permission from Penguin Group publishing  
21 house to adapt and direct *The Muffin Muncher* into a children's "theatrical  
22 adaption" which has been filed with the U.S. Copyright Office.  
23  
24

25 24) In 2006 the Plaintiff attended New York University for a summer in film  
26 studies. In 2007 she graduated from the University of Hawaii-Hilo with a double  
27 degree in Business Administration and Performing Arts.  
28

1 25) In 2009 the Plaintiff moved to Los Angeles and settled in Pasadena, CA with  
2 her son. She began looking for work in the entertainment industry with hopes to  
3 produce and direct. Between 2009-2010 she became a member of the Women in  
4 Film. There she began making connections with Directors, Producers, and Writers.

5  
6  
7 26) Around 2010 the Plaintiff submitted a pitch for a reality television game show  
8 called "Cache Cow" in conjunction with the Women in Film and MTV  
9 Entertainment Group a subsidiary of Paramount Global. MTV was once owned by  
10 Viacom and headed by Bob Bakish the former CEO of both Viacom (2016-2019)  
11 and Paramount Global (2019-2024).  
12  
13

14 27) In 2010 Plaintiff was interviewed as a contract worker for Corovan under The  
15 Walt Disney Corporation. The interview took place at the Disney Lot in Haynes'  
16 office. Haynes was the Facilities Manager who oversaw the contract between  
17 Corovan and Disney and facilitated non-union needs for Disney employees that  
18 worked at buildings as far reaching as the Disney Channel Building in Toluca Lake  
19 to Disneyland in Anaheim. The interview was held by Corovan's Reginal Manager  
20 Guillermo Argueta and included On-site Manager Carlos Velasco.  
21  
22  
23

24  
25 28) The Plaintiff was offered the role by Corovan. At the time the Plaintiff worked  
26 as a subordinate to Haynes, who was in a principal-agent relationship between  
27  
28

1 Disney and the subagent Corovan. During this time Haynes pursued a personal  
2 relationship with the Plaintiff that continued for several years.

3  
4 29) Because of the personal nature of their relationship Haynes was privy to  
5 personal information of Plaintiff's and had direct access to Plaintiff's material. He  
6 was aware of the Plaintiff's career goals outside of her daily tasks. The Plaintiff  
7 shared some material with him, such as her cooking blog "Truly's Table," and  
8 articles she had written for an online news source. He had also seen various  
9 drawings she had written for an online news source. He had also seen various  
10 drawings she had illustrated including her storyboard illustrations for *Prince of*  
11 *Pizzan*.

12  
13 30) In the course of the relationship Haynes had personal interactions with  
14 Plaintiff's son Hunter J. O'Toole and was present in Plaintiff's life to the extent  
15 that Haynes took on the part of a step-father figure to her son.  
16

17  
18 31) In November of 2011 the Plaintiff left Corovan to work in the Facilities  
19 Mailroom at the Disney Channel Building. The Plaintiff began "elevator pitching"  
20 executives at various Disney cable channels within the building. It was here,  
21 sometime between late November 2011-March of 2012, the Plaintiff met Chris  
22 Savino and pitched him *Max and Puppy*. Savino was the Director of the cartoon  
23 *Kick Buttowski* at Disney XD. He encouraged her to connect with other staff  
24 members at Disney XD. The Plaintiff did and gave a hardcopy to his colleagues  
25  
26  
27  
28



1 who said they would “pass it on to the Director who had the creative decision-  
2 making power.”  
3

4 32) Around March 2012 the Plaintiff took a position as the Second Assistant to  
5 President of ABC Family in the Disney Channel building. During that time, she  
6 maintained the schedule for a shared conference room that was used by the entire  
7 building and had continued interactions with Disney XD.  
8  
9

10 33) The end of 2012 Plaintiff took a position working for the VP of Corporate  
11 Controllershship in Disney’s Financial Planning and Analysis division. In this role  
12 she took on many responsibilities and worked with a vast number of other C+  
13 executives. The Plaintiff continued to network and by 2013 she had been accepted  
14 into the “Disney’s Writer’s Group.”  
15  
16  
17

18 34) In 2013 Chris Savino submits a short to Nickelodeon’s Short’s Program. The  
19 short consists a of a “white rabbit” and becomes the first entry for what he is  
20 known to be credited for, *The Loud House Franchise*. Unbeknownst to the Plaintiff  
21 at the time, Savino leaves Disney after finishing his last project Mickey’s “Bad Ear  
22 Day” around 2013.  
23  
24  
25  
26  
27  
28



- 35) January 2014 Plaintiff created *Westfield*. She filed it with the WGA and later filed for copyright with the U.S. Copyright Office.
- 36) March 2014 Plaintiff begins working on films for Blanc-Biehn Productions. Her son accompanies her and becomes part of the crew as well.
- 37) 2014 Nickelodeon announces they are developing Chris Savino's short into a future series. The short is a redeveloped 2.5-minute animated piece.
- 38) In 2014 Disney had a restructuring and Plaintiff transitioned out over the next six months. It was around this time in 2014 that Plaintiff was unexpectedly approached by Howard Gimple, Chief Creative Officer and Writer, for TajMania Entertainment, a company with ties to Nickelodeon. The Plaintiff was contacted by TajMania via social media by Howard Gimple. The correspondence was unsolicited by Plaintiff who was unfamiliar with the company.

1 39) TajMania Entertainment was composed of the following members: Larry Juris  
2 Owner, Howard Gimple Chief Creative Officer and Writer, Sam Laskey Writer,  
3 Tom Caggiano Cartoonist and illustrator, and Emanuel “Manny” Reyes Co-owner.  
4 The company promotes three of their scripts on its social media pages: *Oye*  
5 *Christina*, *Max Helsing*, and *Rescue Dogs*. (See EXHIBIT)  
6  
7

8 40) Gimple explained that they were a “socially conscious children’s animation  
9 company,” and were interested in Plaintiff’s ability to connect them to Disney.  
10 They claimed they had vast experience in the industry and had previously worked  
11 on large budget projects. He mentioned they would also be interested in seeing any  
12 work Plaintiff may have.  
13  
14

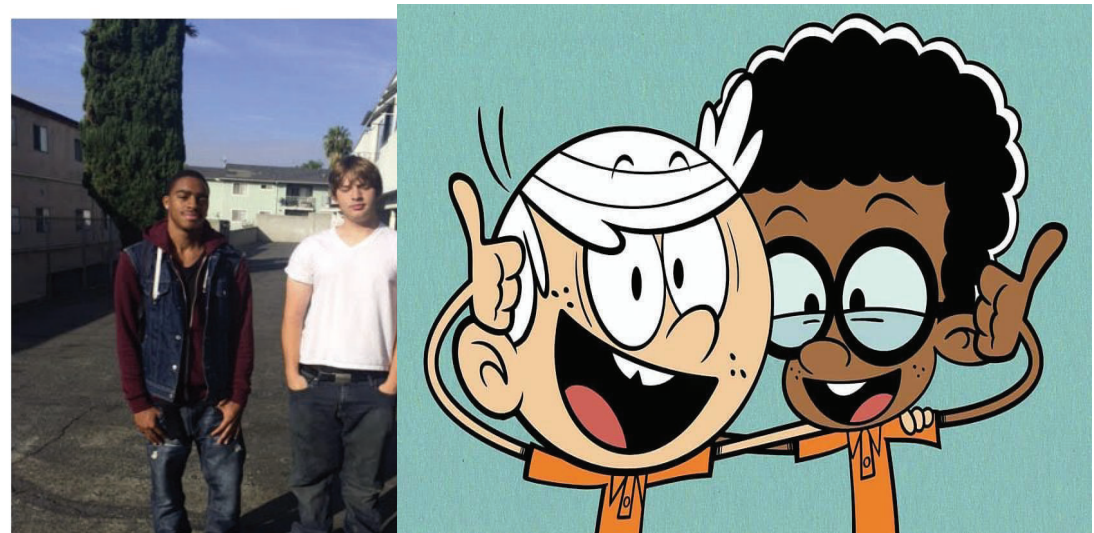
15 41) The Plaintiff responded to Gimple’s email, and he arranged a lunch meeting  
16 between the Plaintiff and his “business partner” in Los Angeles, Sam Laskey. After  
17 reviewing Plaintiff’s material, TajMania Entertainment brings her aboard as VP,  
18 West Coast Representative and Creative Development. Plaintiff had a contract  
19 drawn up and it was agreed upon by all parties.  
20  
21  
22

23 42) Between 2014-2015 Plaintiff created *Live! With Truly* and sent copies to  
24 TajMania Entertainment. The Plaintiff also sent TajMania detailed character  
25 descriptions, merchandising concepts, visuals of character styles, and other  
26 pitching material that would aid in the future developments of the script.  
27  
28

43) Days after receiving the drafted script, Howard Gimple wrote to the Plaintiff telling her the company was disbanding. In these emails he offered the rights of their scripts to Ms. O'Toole, and stated that, "Hollywood has hundreds of success stories where scripts that were started by one person and finished by others became big hits."

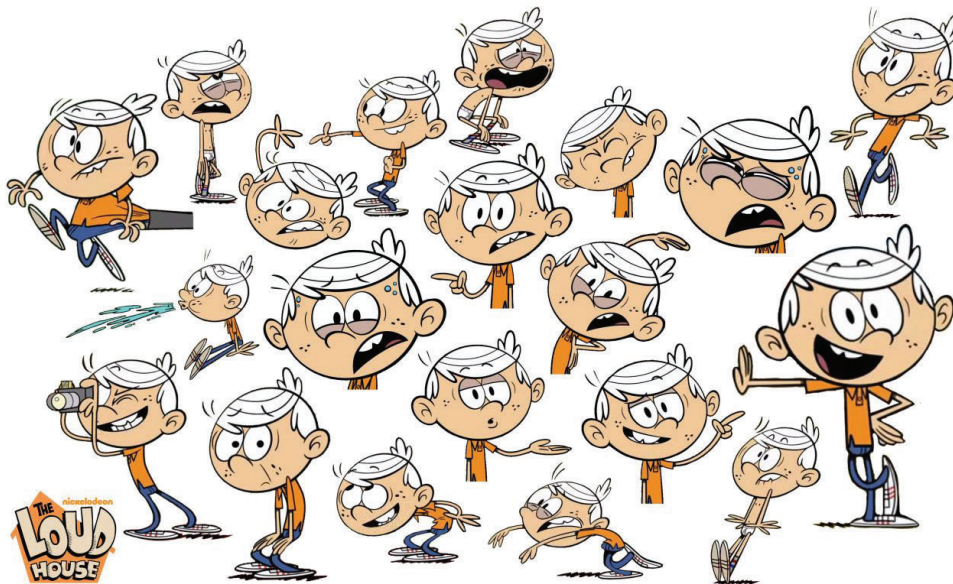
44) It is with information and belief that between 2012-2014 TajMania Entertainment pitched multiple scripts to Nickelodeon who "passed after some initial interest."

45) During the development of *Live! With Truly* Plaintiff sent a photo of her son Hunter and his friend to TajMania with the description "for the boys". The photo was meant to depict the two main male characters in *Live! With Truly*. Plaintiff had shown this to Haynes who knew of her intent to use the image of Hunter and his friend in the final product.



46) While negotiating with TajMania Entertainment the Plaintiff had shared details of the business transactions with Haynes. Knowing that the Plaintiff was finishing her script Haynes, coerced, badgered, and berated her into sending him a copy so he “could give edits and feedback,” all while leaving Ms. O’Toole under the pretense that they were in a long-term relationship.

47) The first known rough draft image of the newly reworked *Loud House* is published by Variety Magazine. It depicts “Lincoln Loud” and his ten human sisters. In several publications Savino, who has been credited as the creator of *The Loud House*, stated that Jenna Boyd SVP, Animation Development at Nickelodeon who was helping Savino through the “Shorts” submission process suggested that the show would be more marketable to the Studio if it was created with “human” characters rather than “rabbits”.







48) The Plaintiff alleges that she recognized the images in the illustration drawing by Savino to have a striking resemblance to herself and her supervisors at Disney. Plaintiff claims that this was an intentional act in the process of reshaping the Plaintiff's work for profit for Nickelodeon Group and its parent companies.

49) It is with belief that sometime on or around the summer of 2015 Nickelodeon purchases *The Loud House* from Chris Savino and the first "sneak-peek" is featured in San Diego at Comic-Con the summer of 2015.

50) "On September 29, 2016, National Amusements, the parent company of CBS Corporation and Viacom, wrote to Viacom and CBS Corporation encouraging the two companies to merge back into one company... In October 2016, Viacom

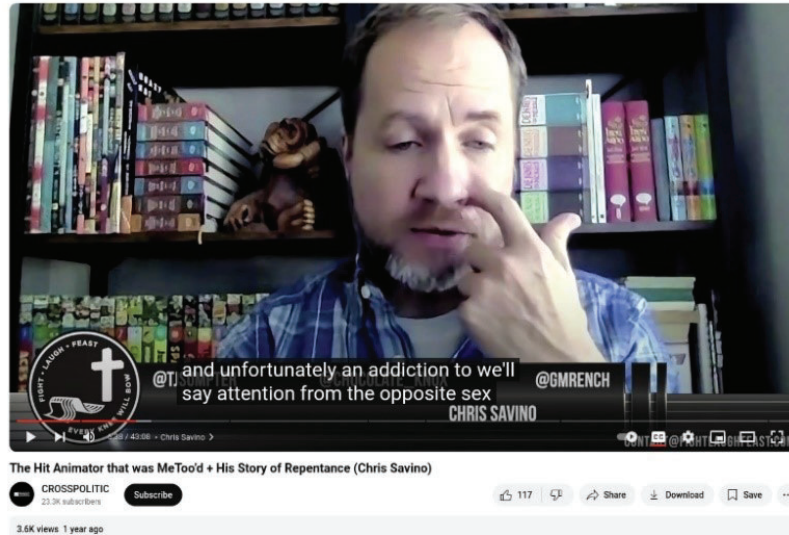
1 named Bakish as acting president and CEO of Viacom and Viacom Global  
2 entertainment Group.  
3

4 51) May 2016 *The Loud House* premieres on Nickelodeon. Shortly after  
5 Nickelodeon commits an infringement within an infringement when executives  
6 feature Chris Savino playing himself and promoted *The Loud House* on *All in with*  
7 *Cam Newton*, a show found to have been illegally produced by ViacomCBS and  
8 broadcast on Nickelodeon.  
9  
10

11 52) According to Wikipedia, “[i]n early 2017, Bakish laid out a five-point plan to  
12 return Viacom to producing a steady profit. This consisted of focusing on Viacom's  
13 six flagship brands: BET, Comedy Central, MTV, Nickelodeon, Nick Jr. and  
14 Paramount.  
15  
16

17 53) 2017 Variety Magazine collaborates with Nickelodeon for the third straight  
18 year and features “Animators to Watch” unveiling special addition covers with  
19 exclusive *Loud House* artwork. The head editor of Variety Magazine Tim Gray is  
20 close personal friends of Haynes and his wife, who worked on his book.  
21  
22

23 54) 2017 Chris Savino is fired by National Amusements et al after sexual  
24 harassment allegations arise, and he faces charges before the Animation Guild.  
25 Below is a statement by Chris Savino from an interview he did in 2023 with Cross  
26 Politics.  
27  
28



## Production History

2017

On March 28, 2017, Paramount announced that it was later reported that the film was not being released later than expected.<sup>[3]</sup>

2019

- On January 18, 2019, it was announced that the film was not being released later than expected.<sup>[3]</sup>
- On February 5, 2019, it was announced by then-Vice that the film was not being released on the streaming service Netflix.<sup>[5]</sup>
- On April 30, 2019, it was announced that the movie was not being released later than expected.<sup>[3]</sup>
- On June 20, 2019, Kevin Sullivan completed a draft of the script.
- On January 4, 2021, Kevin Sullivan confirmed that the film was not being released later than expected.<sup>[3]</sup>

55) 2017-2019 the Plaintiff begins receiving harassing emails from Haynes. The emails include content of an extortive nature while Haynes aggressively states that his “Disney contacts have shown me how to change enough copyrights that you can’t be attached. Kick Rocks!!!!”



1 56) On or around 2017 Haynes and his wife become part of Lower Depths Theater.

2 On or around 2018 the Haynes's attend a poker night for Lower Depths Theater  
3 and attendees bid on their "Gift Wall" a story board of topics of interest for future  
4 productions. The topics include sex trafficking and Honor Killing.  
5

6  
7 57) "On March 30, 2018, CBS Corporation made a play to buy Viacom and merge  
8 them back into one company and that Bob Bakish be maintained as president and  
9 COO...These conflicts had resulted from Shari Redstone, [now owner of National  
10 Amusements], seeking more control over CBS Corporation and its leadership...  
11 Eventually, on May 14, 2018, CBS Corporation sued its and Viacom's parent  
12 company National Amusements and accused Redstone of abusing her voting  
13 power in the company and forcing a merger that was not supported by it or  
14 Viacom."  
15  
16  
17

18  
19 58) 2018 Later that June, Bakish announced that Viacom [would] produce some  
20 new series exclusively for Netflix, beginning with Nickelodeon-related content.  
21

22 59) On January 18, 2019, and February 5, 2019, Bob Bakish announced that *The*  
23 *Loud House Movie* was being pulled from theater schedules and moved to Netflix.  
24

25 60) On February 5, 2019, it was announced by Viacom CEO Bob Bakish that the  
26 [Loud House Movie] would be released on the streaming service Netflix. In 2017  
27 Paramount Global established that "Paramount Pictures was originally going to  
28

1 release the film [in 2020 through Paramount] but was pulled from its schedule.

2 Nickelodeon Movies then signed a deal with Netflix to have the film distributed on  
3 their service. Produced by Nickelodeon Movies, with animation done overseas. [I]t  
4 was released worldwide in August 2021 by Netflix.  
5

6  
7 61) March 2019 Ms. O'Toole leaves LA and moves back to Michigan. Haynes  
8 continues to send harassing emails. Haynes states he had informal talks with  
9 Netflix and HBO. He begins to make threats that he is "sending my Detroit boys to  
10 give you a proper home welcoming", statements he made money from the  
11 Plaintiff's scripts, statements he was "off to London to make a deal," followed by  
12 photos of thousands of dollars spread out on a bed tell me to "hit him up if you  
13 need aid", and that he was selling written pornographic material. He sends the  
14 Plaintiff a seven-page scene of a stripper being sexually and physicals abused by a  
15 male patron.  
16  
17  
18

19  
20 62) April 2019 Broadway World publishes an article that T. Tara Turk-Haynes has  
21 been commissioned to study out and write a play on the topic of Honor Killing.

22 63) On August 2, 2019, it was agreed that Bob Bakish would serve as CEO of the  
23 combined company with the president and acting CEO of CBS Corporation,  
24 Joseph Ianniello, overseeing CBS Corporation-branded assets. On August 7, 2019,  
25 CBS and Viacom separately reported their quarterly earnings.  
26  
27  
28

1 64) On August 13, 2019, CBS and Viacom officially announced their merger; the  
2 combined company was to be named ViacomCBS, with Shari Redstone serving as  
3 chair. Upon the merger agreement, Viacom and CBS jointly announced that the  
4 transaction was expected to close by the end of 2019, pending regulatory and  
5 shareholder approvals. The merger required approval by the Federal Trade  
6 Commission (FTC).  
7

9 65) The June 2019 the first draft of the script for *The Loud House Movie* was  
10 written. In published statements Bob Bakish, CEO of Viacom, announces the  
11 movie will be pulled from theaters and enters into a contract with Netflix.  
12

13 66) On October 14, 2019 the spin-off show *The Casagrandes* was released by  
14 Nickelodeon and Paramount Plus and ran till February 2022.  
15

16 67) Bakish retained the role of CEO when CBS Corporation and Viacom reunited  
17 under a single company to form Paramount Global (then known as ViacomCBS),  
18 which closed on December 4, 2019.  
19

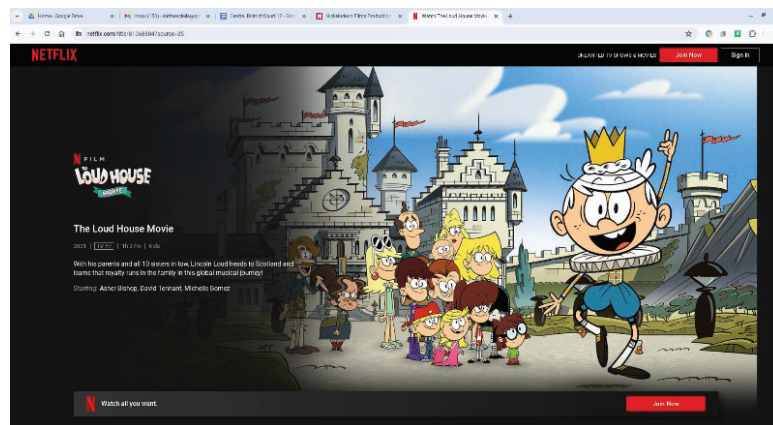
20  
21 68) On December 10, 2019, days after the merger, Bakish announced that  
22 ViacomCBS would look to divest Black Rock, the building that held CBS's  
23 headquarters since 1964. He stated, "Black Rock is not an asset we need to own,  
24 and we believe that money would be put to better use elsewhere."  
25  
26  
27  
28

69) January 2021 Bob Bakish announced the launch of the newly rebranded Paramount Plus platform that would be streaming material as of March 2021 and would release hundreds of video titles throughout the month of August to promote the platform.

70) The *Loud House Movie* is announced to be released in April 2021. But in later announcements the *Loud House Movie* release date is set for summer 2021.

71) July 2021 the Plaintiff purchases her first independent television channel and starts preparing to launch *The Experience* with new content.

72) August 20<sup>th</sup>, 2021, *The Loud House Movie* is released on Netflix.



73) August 20<sup>th</sup>, 2021, Nickelodeon released *Paw Patrol* in theaters and Paramount Plus simultaneously worldwide.

74) August 20<sup>th</sup>, 2021, Nickelodeon released *Clifford the Big Red Dog* in theaters and Paramount Plus simultaneously worldwide.

1 75) August 20<sup>th</sup>, 2021, Bob Bakish announces that, via ViacomCBS, he is  
2 partnering with FOX to relaunch CBS/FOX Video once headquartered in Livonia,  
3 MI.  
4

5 76) November 2021 Nickelodeon and Paramount+ release *A Loud House Christmas*  
6 movie across their streaming platforms. It is on information and belief that *The*  
7 *Really Loud House Christmas* is a direct infringement of Plaintiff's work. This film  
8 was followed by the release of the second spinoff show *The Really Loud House*  
9 (2022) which continues to be broadcast on Nickelodeon and streams on Paramount  
10 Plus.  
11  
12

13 77) November 2021, Plaintiff is hired by an accounting firm in Los Angeles and  
14 moves back in January 2022.  
15

16 78) February 2022, the spin-off show *The Casagrandes* is cancelled.  
17

18 79) March 2022 the Plaintiff moves into her downtown Los Angeles apartment  
19 owned and operated by a Delaware Corporation.  
20

21 80) On or around May of 2022 the Plaintiff Ms. O'Toole became part of the cast  
22 and crew for *Hip Hop Circus* where she began writing, working on production, and  
23 helping with casting.  
24

25 81) On or around June 2022 the Plaintiff Ms. O'Toole begins receiving text  
26 messages from a man she later identifies as Haynes. The texts are sexual in nature  
27 and explicit. They later include photos and videos of a sexual nature.  
28

1 82) On or around July of 2022 Plaintiff's keys go missing and she spends several  
2 nights out of her home. When she returns her closet door is broken.

3  
4 83) On or around August or September of 2022 the PLAINTIFF was meeting with  
5 Directors and various *Artists* in preparation for the scheduled launch of her first  
6 television channel at the end of the year.

7  
8 84) In October 2022 Haynes emails the Plaintiff Alethea O'Toole stating, "thought I  
9 was you," and that he had seen her in Los Angeles. Haynes goes on to say he and  
10 Lucy Magana, a former coworker of his and Plaintiff's, knew where she lived and  
11 later sends a threatening letter to her home in DTLA.

12  
13 85) By November 2022 the "anonymous" texter had been identified by the Plaintiff  
14 as being Haynes. His text messages became explicit, attempting to lay groundwork  
15 to convince Plaintiff into having a relationship, into allowing him access to her  
16 phone's contact list, and by attempting to gain the Plaintiff's permission to enter  
17 her apartment.  
18

19  
20 86) One evening the Director of *Hip Hop Circus* scheduled an impromptu writers'  
21 meeting interrupting potential plans between Plaintiff and Haynes. The next  
22 morning Plaintiff receives jealous angry text messages from Hayes for not  
23 allowing him to send his friend to Plaintiff's apartment. Within three days' time  
24 the Plaintiff received messages from Sean Cook, Director of *Hip Hop Circus*, that  
25  
26  
27  
28

1 he was in the hospital with a headshot wound, but was lucky, and recovering in the  
2 hospital.

3  
4 87) November 2022, witnesses identify Haynes at a bar across the street from her  
5 apartment. He and his wife are later identified in and around her building on  
6 several occasions. Although Plaintiff notified the building manager of her situation  
7 she found that the camera on her floor consistently started to go out. Other strange  
8 things started to occur.  
9

10  
11 88) By 2023 Plaintiff files a restraining order against Haynes asking the court to  
12 hold passports. No server was able to serve the summons in person. Plaintiff was  
13 granted Continuance by the court; however, Mr. and Mrs. Haynes boarded a plane  
14 for the UK the morning of the next court date. When Plaintiff returned home and  
15 checked the mail, she found a handwritten letter had been delivered to her home.  
16 The contents were vulgar, and inferred Haynes was influencing judges. It stated,  
17 “But now I know where you live, I will be sure post your pictures around DTLA,”  
18 and “I took some screenshots from Scott’s phone and your Pussy looks so beat up.  
19 I plan to share them with folks ~~and~~ at Disney and other studios. By next week you  
20 will be famous,” and continued to hatefully call Plaintiff “poor white trash.” It was  
21 signed “Love, Lucy.”  
22

23  
24 89) In 2024 Plaintiff began preparing pleadings and evidence related to the  
25 controversy at hand at Chrysalis in Downtown Los Angeles located at 522 Main  
26  
27  
28

1 St., Los Angeles, California, and is located at the cross street of Los Angeles and  
2 6<sup>th</sup> and around the corner from Plaintiff's apartment in DTLA which was located at  
3 121 N. 6<sup>th</sup> Street, #510, Los Angeles, California.  
4

5 90) While compiling evidence at Chrysalis, the Plaintiff discovers that Paramount,  
6 Nickelodeon, Netflix, and Defendants named herein developed two new *Loud*  
7 *House Franchise* films set to release 2024; *The Casagrandes Movie* released  
8 March 22, 2024 on or around Plaintiff's enrollment date with Chrysalis  
9 (Distributed by Netflix); and *No Time to Spy: A Loud House Movie* released June  
10 21<sup>st</sup>, 2024 on Paramount Plus.  
11

12 91) She also discovered the existence of Nickelodeon's live action version of *The*  
13 *Loud House* entitled *The Really Loud House* November 2022, through November  
14 2024. Plaintiff also found *A Really Haunted Loud House Movie* released  
15 September 28, 2023. The plaintiff alleges that the influence caused by the actions  
16 of creating and cancelling these shows, by any and all parties involved, have a  
17 great impact on the lives of cast, crew, and staff of such projects.  
18

19 92) The Plaintiff goes on to assert that this fluctuation is a mass manipulation of  
20 profits, benefits, and markets in which they directly impact for benefit and profit  
21 both influencing national and international markets of trade and financial  
22 instruments. The Plaintiff asserts that it is the infringement itself that creates there  
23 uncertain markets by the studio and the infringing benefacting parties whether they  
24  
25  
26  
27  
28



1 were vicarious or not. And further asserts that these uncertain markets have created  
2 a great disappearance between market values.

3  
4 93) Between September 2024 – November 2024, and amid the time the Plaintiff  
5 contacted Chrysalis, Defendant Larry Juris and DEFENDANT D. Scott Haynes  
6 unexpectedly contacted the PLAINTIFF via LinkedIn. They both attempted to  
7 contact her through a LinkedIn account that is unused and associated with a new  
8 email address. The PLAINTIFF has not been contacted by DEFENDANT Larry  
9 Juris for 10 years.  
10  
11

12 94) Around October 2024 the Plaintiff discovers three things after compiling court  
13 pleadings at Chrysalis's computer lab in downtown LA:  
14

15 95) Unknown public patrons from Chrysalis had uploaded their personal  
16 information into the Plaintiff's Microsoft One Drive.  
17

18 96) The Plaintiff was missing files from her Microsoft One Drive that held evidence  
19 in it pertaining to the controversy at hand.  
20

21 97) Chrysalis is financially sponsored by and partnered with Netflix, Disney  
22 Resorts, and EY among others.

23 98) March 2024 the Plaintiff begins working on her evidence at Chrysalis, a  
24 company that fosters employment in DTLA. While compiling her case the Plaintiff  
25 realized that her online drive had been compromised by individuals accessing her  
26 information via Chrysalis's computer lab. Around this time the Plaintiff also  
27  
28

1 discovered that her online files had been infiltrated, and evidence was deleted. She  
2 learned that Chrysalis is sponsored by Netflix and Disney Resorts and works with  
3 volunteers from theater groups who have close ties with Haynes and his wife T.  
4 Tara Turk-Haynes, a playwright.  
5

6  
7 99) In 2024, Nickelodeon Animation / National Amusements et al released the  
8 following: *The Casagrandes Movie*, *No Time to Spy: A Loud House Movie*, and  
9 four new episodes of the *Loud House* series.  
10

11 100) November 12, 2024 Nickelodeon premieres three new episodes of *The Loud*  
12 *House* series: “Kara-less Whisper/Dollars and Scents”, “Bulking and Sulking”, and  
13 “Wild Goss Chase.”  
14

15 101) September 2024 Haynes reaches out to Plaintiff via a new LinkedIn account.  
16

17 102) On around a month later in 2024 Larry Juris, owner of TajMania Entertainment,  
18 sends Plaintiff a connection request through LinkedIn.  
19

20 103) May 6<sup>th</sup>, 2025 Plaintiff sends out Demand Letters to Paramount, Nickelodeon,  
21 Netflix, and National Amusements. Additionally, Plaintiff hires a mediator to  
22 contact the above-listed parties and offer an opportunity for mediation and  
23 negotiation in leu of taking up the court’s time and resources. To this day her  
24 requests have gone unanswered. The Plaintiff alleges that the parties had ample  
25 time to respond and learn more about the controversy at hand.  
26  
27  
28

1 104) May 19<sup>th</sup>, 2025 – May 23<sup>rd</sup>, 2025 Plaintiff finds that her online files are being  
2 accessed without her permission. To minimize damage to Plaintiff's property and  
3 proprietary information, Plaintiff minimized internet access; however, in the  
4 limited time that she did access the internet, the Cyber attackers accessed over 35  
5 files pertaining to this court case including exhibits Plaintiff had prepared.  
6  
7

8 105) It is on information and belief that ViacomCBS holds all the copyrights for the  
9 entirety of the *Loud House Franchise*. And that all three shows, and five films are  
10 currently airing on Paramount Plus, Nickelodeon's international broadcasting  
11 outlets and/or Netflix.  
12

13 106) The Plaintiff alleges that Mr. Savino, Haynes and TajMania were the only ones  
14 with access to all the Plaintiff's works besides herself. The Plaintiff continues to  
15 allege that those parties and/or other Does knowing or vicariously shared that  
16 information with other individuals who perpetuated the systemic illegal  
17 copyrighting actions.  
18  
19

20 107) The Plaintiff states that the element of originality is displayed in her  
21 copyrighted work noted herein as original and fixed; and that Nickelodeon  
22 Animation et al, Netflix, TajMania Entertainment and Defendants named herein,  
23 took great care to replicate the elements of the original work into the film *The Loud*  
24 *House Movie*.  
25  
26  
27  
28

1 108) And that copyright elements are not just present in *The Loud House Movie* but  
2 are present throughout the entire *Loud House Franchise* as derivatives of the  
3 infringe's tangible works: *Prince of Pizzan*, *The Muffin Muncher: The Musical*,  
4 *Live! with Truly, Max and Puppy*, and *Westfield*.  
5

6 109) The copying and similarities between Plaintiff's works and Defendants'  
7 copyright infringing productions are numerous and extensive. The Defendants'  
8 *Loud House Movie* production follows the storyline of Plaintiff's *Prince of Pizzan*  
9 storyboard illustrations in settings, style, character, theme, and overall look and  
10 feel. Defendants' production also has lines from the story itself incorporated in the  
11 production. The story incorporates a dragon who is one of the main characters of  
12 both *Prince of Pizzan* and *The Muffin Muncher*. Plaintiff will submit extensive  
13 analysis with examples of Defendants' unlawful copying from Plaintiff's original,  
14 copyrighted works.  
15  
16  
17  
18

#### 19 **INVASION OF PRIVACY / RIGHT OF PUBLICITY**

20

21 110) Plaintiff alleges that Paramount, ViacomCBS, Nickelodeon, Netflix, TajMania,  
22 Defends, and Does took great care not just to illegally copyright Plaintiff's work,  
23 but also to infiltrate her life on many personal levels. Following the habits of  
24 Plaintiff, her friends, and family through social media.  
25  
26  
27  
28

1 111) Plaintiff alleges that the photos, images, likeness, names, and character traits  
2 were introduced into the *Loud House Franchise* material, with intention, for the  
3 development of characters, character traits, storyline developments, situations,  
4 themes, and over all look and feel. Section §652 of the Restatement (Second) of  
5 Torts (1977) states “that Appropriation of Name or Likeness as ‘One who  
6 appropriates to his own use or benefit the name or likeness of another is subject to  
7 liability to the other for invasion of his privacy,’” (Kirby v. Sega of Am., Inc., 144  
8 Cal. App. 4th 47 (2006)).

9  
10  
11  
12 112) The elements of a common law action resulting from illegal use of Publicity  
13 Rights are defined as the unauthorized use of Plaintiff’s identity to the Defendant's  
14 advantage by appropriating the Plaintiff’s name, voice, likeness, etc., commercially  
15 or otherwise, and resulting injury.

16  
17  
18 113) Plaintiff states that her social media was targeted by litigants and/or Does both  
19 named and not named herein. And that intentional actions took place to use the  
20 photos, images, likenesses and name sakes found on the Plaintiff’s social media  
21 which came to resemble themes, settings, characters, time sequences, pace, and  
22 total concept and feel.

23  
24  
25 114) These photos, images, likenesses and name sakes of Plaintiff, her son, her  
26 friends, her family members, and/or former supervisors were used for the purpose  
27 of profiting, ultimately to National Amusements via equity, acquired through  
28

Paramount and ViacomCBS while Shari Redstone, Owner of National Amusements, was sitting CEO and Board of Directors member over Paramount and ViacomCBS and had both voting power as well as final approval over large contract changes such as the one that occurred between Netflix and Nickelodeon via Bob Bakish for *The Loud House Franchise*.

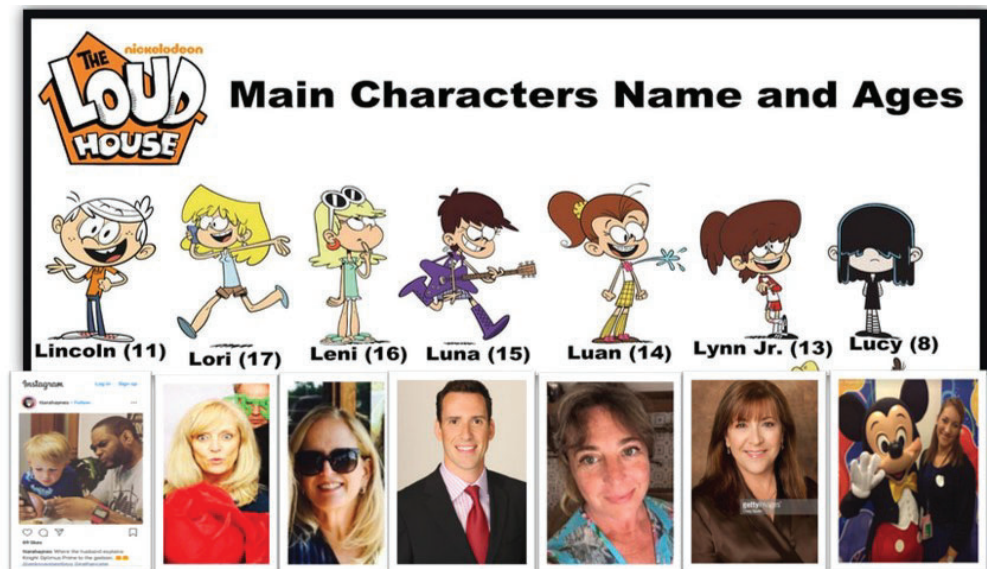


EXHIBIT 16 Plaintiff's Walt Disney Co. Supervisors

213

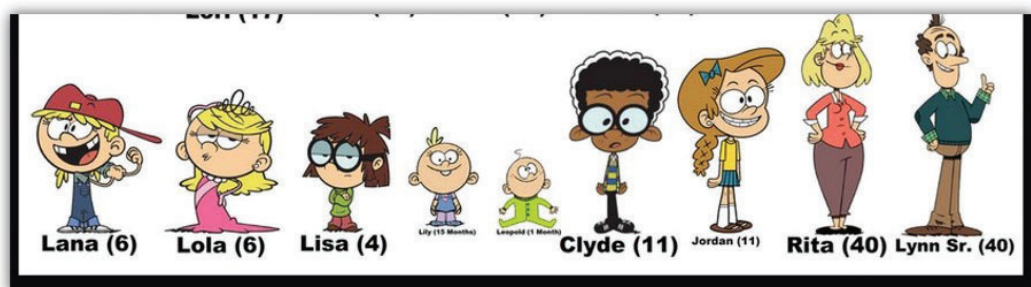


EXHIBIT 16 Plaintiff's Walt Disney Co. Supervisors

214

1 115) At *no time* did Plaintiff grant permission to any entity or individual, for use of  
2 the name, image or personal expression, of the Plaintiff, her son, her friends, her  
3 family members, or any images posted by her on any social media platform.  
4

5 116) At *no time* did Plaintiff grant permission to any entity or individual, for use of  
6 proprietary information in the *Loud House Franchise*, for profit or otherwise.  
7

8 117) From the detail, quantity and direct relation of characters, character traits,  
9 settings and themes used in the development, publishing and worldwide  
10 distribution of *The Loud House Franchise*, to the litigants named herein the  
11 complaint the Plaintiff believes these actions were done directly, indirectly,  
12 intentionally, contributory, vicariously and/or with deceitful intentions.  
13  
14

15 118) The Plaintiff found that most of the images used from her social media were  
16 photos she posted between 2014-2015 on her social media. However, there were  
17 others that were sent privately to litigants which the Plaintiff also identified as a  
18 direct violation of Publicity Rights.  
19

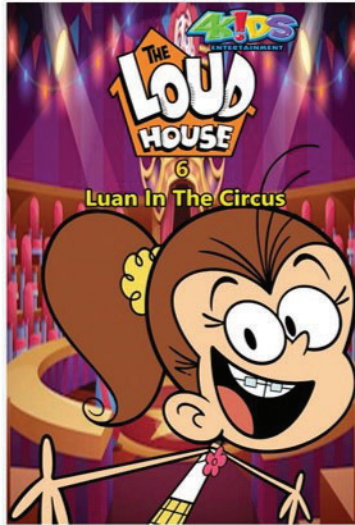
20 119) The following are some of the Plaintiff's personal images that were discovered  
21 as themes, settings, characters, time sequences, pace, and total concept and feel  
22 and/or within the *Loud House Franchise*.  
23

24 a) Plaintiff reimaged as "Luan Loud" with her braces (Above). And Plaintiff at the  
25 age of two (Below) in Livonia, Michigan (Left) and *The Loud House* main  
26  
27  
28



1 character “Lana Loud” (Right). The Plaintiff believes that she was intentionally  
2 depicted in defamatory ways in many instances.  
3

4 Nickelodeon: *The Loud House*  
Luan Loud (Main Character)



The Plaintiff: Alethea O'Toole



EXHIBIT I-2 Plaintiff, Alethea O'Toole

b)



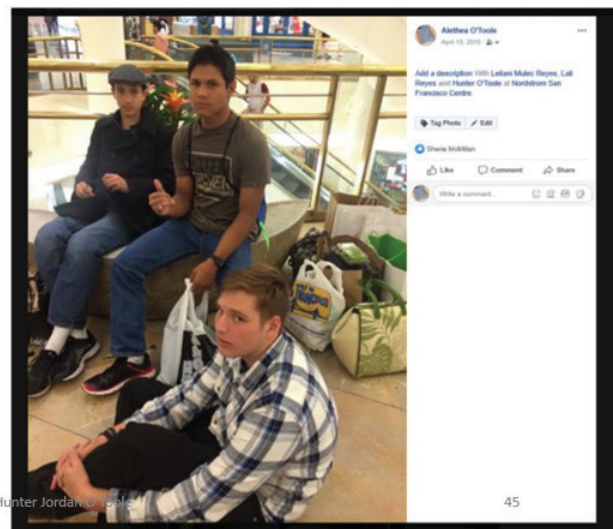
26 120) Plaintiff's son Hunter Jordan, reimagined as “Boy Jordan” and used in various  
27 episodes for profit by Nickelodeon et al.  
28



Nickelodeon: *The Loud House*  
"Boy Jordan" (Minor Character)



The Plaintiff: Hunter Jordan O'Toole  
Facebook (2015)



121) There is an extended statutory time period for Right of Publicity claims in California. Plaintiff has a post-mortem right under Cal. Civ. Code Section 3344.1 to bring a claim on behalf of a deceased person's likeness for another 70 years after their death. Therefore, the use of Rights of Publicity extends to the use of the Plaintiff's biological father who has since past and whose photos, images, name and/or his likeness have been recreated as the grandfather to *The Loud Family*. (See Exhibit)

122) Lastly Plaintiff alleges that there are many characters that have been created in *The Loud House* from the photos, images, likeness, or name of litigants named herein, namely Darryl "Scott" Haynes, his wife T. Tara Turk-Haynes, Larry Juris, his wife Barabra Juris, Howard Gimple, his wife Christine Johnson, Sam Laskey, and his wife Rebecca Gimple, as well as Does not named as Defendants at this time.



Clyde McBride



EXHIBIT - I-5

50

## V. CLAIMS

123) **Claim #1 Copyright Infringement** – Plaintiff repeats and realleges each of the foregoing paragraphs as if fully set forth herein.

124) The Plaintiff asks the court that the “Entire controversy doctrine” be recognized in this Intellectual Property case under the Copyright Act, for multiple infringements of the Plaintiff’s work that were developed into what is now known as *The Loud House Franchise*. And thus, under this umbrella 17 U.S. Code § 501 Infringement of copyright; the claim asserts that the Copyright Act lays claims for relief, remedies, and damages under the Lanham Act (including Unfair Competition & Trademarks), and the Sherman Act (including Antitrust claims).

125) 17 U.S.C. § 106 The exclusive right to copy - This is an action for the exclusive right to copy pursuant to copyright infringement laws subject to the Copyright Act,

1 17 U.S.C. § 101 et seq. for the Plaintiff’s original works titled *Max and Puppy*,  
2 *Prince of Pizzan*, *Live! With Truly*, and *Westfield*. The court recognizes the holding  
3 of trademark and patents over copyright arms as it applies to a “communicative  
4 product that is a product that is valued not primarily for its physical qualities such  
5 as a hammer, but for the intellectual content that it conveys such as a book or...a  
6 video.” (Dastar Corp. V. Twentieth Century Fox Film Cor., 2003). And as such  
7 works were authored solely by the Plaintiff and filed with the copyright office the  
8 author has the exclusive rights set forth in actionable elements including: “total  
9 concept and feel, theme, characters, plot, sequence, pace and setting” and that these  
10 are present in *The Loud House Movie*, as well as the series which is the basis for  
11 the movie. Copyright Interests - Derivative Work (17 U.S.C. §§ 101, 106(2)).  
12  
13  
14  
15  
16

17 126) 17 U.S. Code § 201 Ownership of copyright - Validity: “In any judicial  
18 proceedings the certificate of a registration made before or within five years after  
19 first publication of the work shall constitute prima facie evidence of the validity of  
20 the copyright 17 U.S.C. § 410(c).  
21

22 127) PLAINTIFF claims that multiple original works were pilfered by the  
23 DEFENDANTS and were used in the plagiarizing process of selling, globally  
24 distributing and developing these works into one animated work titled the *Loud*  
25 *House*. And furthermore, that the Plaintiff’s original works were sold, globally  
26 distributed and developed by the Defendants as “spin-off” shows titled the  
27  
28

1 *Casagrande Family* (2019-2022) and *The Really Loud House* (2022-Current), and  
2 as films in the following titles: *The Loud House Movie* (August 2021-Current), *The*  
3 *Loud House Christmas* (November 2021), *The Really Haunted Loud House* (2023),  
4 and *The Casagrandes Movie* (2024), *No Time to Spy: A Loud House Movie* (2024).  
5  
6

7 128) The Plaintiff asserts that the National Amusements, Nickelodeon and  
8 Defendants factually copied original expressions of the works listed herein the  
9 complaint without the owner's permission. That Mr. Savino, Haynes and TajMania  
10 Entertainment had access to Plaintiff's works, and that both probative similarities,  
11 and substantial similarities were expressed in elements introduced into *The Loud*  
12 *House Franchise*, were published, televised, and distributed by National  
13 Amusements et al and Netflix. The Plaintiff claims that the infringement is  
14 apparent when applying the "ordinary observer" test and that these infringements  
15 are substantial to the over-all work being sold as *The Loud House*, and thus should  
16 be actionable by law, and applicable to *The Loud House Movie* (2021-Current).  
17  
18  
19  
20

21 129) The Plaintiff also claims that as the author she has exclusive rights over  
22 infringements incurred by secondary transmission. In this case of the film,  
23 secondary transmissions were released on Netflix through a deal made by  
24 Paramount Global and ViacomCBS to transmit *The Loud House Movie* which has  
25 not seen its last act and is still being transmitted by such secondary providers.  
26  
27  
28

130) 17 U.S.C. § 102(a)(b)) - Subject Matter Ideas and Expression. The World Trade Organization defines intellectual property and intellectual property rights as, “given to persons over the creations of their minds.” It is from the “creation of the mind,” or “human intellect,” that all intellectual property is created from inception in its original state. In this way one cannot diverge the creation of the mind from an idea or concept, and thus creations can be easily adapted, manipulated, changed, and redeveloped. In this case the Defendants used the heart of creation in pieces, parcels and illustrations of Ms. O’Toole literary and illustrated creations and fabricated them into works they labeled as *The Loud House Franchise*.

131) The Plaintiff asserts that laws set forth in the Digital Millennium Copyright Act of 1998 also apply. The act amends title 17, United States Code, of The Performances and Phonograms Treaty, providing additional protection and heightens the penalties for copyright infringement on the Internet.

132) 17 U.S.C. § 201(d)(1) Copyright Interests: Assignee, 17 U.S. Code § 204 Execution of Transfers of Copyright Ownership. The Plaintiff does not claim to be the author of the titles *Oye Christina*, *Max Helsing*, or *Rescue Dogs*; instead the Plaintiff claims the copyright by virtue of an exclusive license for the material and that Ms. O’Toole is now the exclusive licensee of the copyright (Exclusive Licensee 17 U.S.C. § 201(d)(2))). Such was the case with TajMania Entertainment when Howard Gimple by written communication, assigned the rights of their

1 scripts to the Plaintiff. Furthermore, the Plaintiff has identified that elements of  
2 those titles have been incorporated into *The Casagrandes* spin off series and *The*  
3 *Loud House Franchise* in general.  
4

5 133) The Plaintiff recognizes this spin off show to be based on one of the Plaintiff's  
6 original characters and rights of ownership transferred to her by TajMania  
7 Entertainment for their script *Oye Christina*. The Plaintiff claims the creator's  
8 vested exclusive rights for the above title were transferred to her when the National  
9 Amusements fraudulently claimed they were abandoning all National Amusements  
10 projects. The same elements of copyright originality and fixation are present in,  
11 and *The Casagrandes Movie* (2024) which was also released on Netflix.  
12  
13  
14

15 134) **Claim #2 Negligence** – Plaintiff repeats and realleges each of the foregoing  
16 paragraphs as if fully set forth herein.  
17

18 135) The Plaintiff claims that the litigants named herein continued to breach their  
19 duty through careless actions that negated reasonable care, and instead defrauded  
20 the federal system by recreating, reenacting, redeveloping, and distributing the  
21 illegal and illicit, wrongful copyright acts, and that these actions have led to grave  
22 negligence on the part of the National Amusements, Paramount Group,  
23 Nickelodeon, Netflix and Defendants; culminating in injury, damages and  
24 grievance to the Plaintiff Ms. O'Toole and her son Hunter O'Toole.  
25  
26  
27  
28

1 136) The Plaintiff claims that these actions were not only foreseeable but would  
2 never have taken place without the direct involvement of the National  
3 Amusements, Paramount Group, Nickelodeon, Netflix, and Defendants. And that  
4 one can conclude from the way access was gained to Plaintiff's works, that it was  
5 an intentional act not one of accident or coincidence.  
6  
7

8 137) In light of the National Amusements, Paramount Group, Nickelodeon, Netflix  
9 and Defendants knowledge, experience and industry persuasion, it is egregiously  
10 neglectful to have involved themselves this deeply in such proximate cause by  
11 means through which acts and omissions took place in infringing on the  
12 PLAINTIFF'S work so heinously.  
13  
14

15 138) TajMania Entertainment used negligent business practices to enter into  
16 agreements with Nickelodeon Animation et al and/or Defendants named herein.  
17

18 139) Variety Magazine used negligent business practices while entering into  
19 agreements with, and following stories about; Nickelodeon, Chris Savino, *The*  
20 *Loud House*, Nickelodeon's Shorts Program, and other related information.  
21

22 140) **Claim #3 Willful Infringement** – PLAINTIFF repeats and realleges each of  
23 the foregoing paragraphs as if fully set forth herein.  
24

25 141) As a Direct Infringer National Amusements / Nickelodeon Animation et al used  
26 the illegally produced *All in with Cam Newton* to promote *The Loud House* on their  
27 network as Chris Savino's new original work.  
28



1 142) As a Direct Infringer National Amusements / Nickelodeon Animation et al used  
2 willful intent to allow Chris Savino and other writers, directors, and executives to  
3 develop, promote, distribute, and make financial profits from *The Loud House* on  
4 their network developed from the Plaintiff's original literary and illustrated works.  
5

6  
7 143) As a Direct Infringer TajMania Entertainment et al and Darryl "Haynes"  
8 Haynes used willful intent to gain access to, develop, promote, distribute, and  
9 make financial profits from *The Loud House* which was created from the Plaintiff's  
10 original literary and illustrated works.  
11

12  
13 144) **Claim #4 Unfair Competition / Fair Use** – Plaintiff repeats and realleges each  
14 of the foregoing paragraphs as if fully set forth herein.  
15

16 145) The claim asserts that National Amusements et al is a monopoly National  
17 Amusements that has used means of unfair competition to recreate material and  
18 goods without fair use. Furthermore, that they targeted and used employees of the  
19 competitor to gain access to and infringe on protectable works all while exploiting  
20 antitrust clauses.  
21

22  
23 146) **Claim #5 Collusion / Civil Conspiracy** – Plaintiff repeats and realleges each  
24 of the foregoing paragraphs as if fully set forth herein.  
25  
26  
27  
28



1 147) National Amusements / Nickelodeon Animation et al collaborate with  
2 individuals and third parties to access, develop, distribute and profit from the  
3 Plaintiff's original copyright protected works.  
4

5  
6 148) The Plaintiff claims that Haynes participated in the conspiracy by entering into  
7 an agreement with Nickelodeon, Chris Savino, and/or TajMania Entertainment  
8 with intent to profit from and use the Plaintiff's material without her consent.  
9

10 149) The Plaintiff claims that TajMania Entertainment and all of its members  
11 participated in the conspiracy with fraudulent intent to profit from copyright  
12 infringement and use the Plaintiff's material without her consent.  
13  
14

15 150) The Plaintiff claims that Netflix entered into this conspiracy by direct, indirect  
16 or vicarious means and has profited from the Plaintiff's protected material.  
17

18 151) The Plaintiff claims that Chrysalis involved themselves in the civil conspiracy  
19 beginning in 2024 when the Plaintiff began assembling the evidence and complaint  
20 at their computer lab. And that Chrysalis leveraged their business relationship with  
21 Netflix (one of their major sponsors) and/or Haynes, by providing privileged  
22 information and/or access to the Plaintiff's files and intent to sue causing spoilage.  
23  
24

25  
26 152) **Claim #6 Breach of Contract** – Plaintiff repeats and realleges each of the  
27 foregoing paragraphs as if fully set forth herein.  
28

1 153) The Plaintiff claims that Chris Savino entered into an implied and verbal  
2 contract when he accepted Ms. O'Toole's work, taking it into his possession and  
3 broke that contract by utilizing it without her permission.  
4

5  
6 154) The Plaintiff claims that Darryl "Haynes" Haynes entered into an implied and  
7 verbal contract when he took Ms. O'Toole's work into his possession and broke  
8 that contract by utilizing it without the Plaintiff's permission.  
9

10 155) The Plaintiff claims that TajMania Entertainment entered into a written  
11 business contract when they requested to see Ms. O'Toole's works taking them  
12 into their possession intending to sell them for profit and broke that contract by  
13 utilizing those works without the Plaintiff's permission.  
14  
15

16 156) **Claim #7 Extortion** – Plaintiff repeats and realleges each of the foregoing  
17 paragraphs as if fully set forth herein.  
18

19 157) Plaintiff claims that Haynes used extortive means to gain access the Plaintiff's  
20 work. That he used the material to benefit himself by means of monetary  
21 compensation, financial instruments, gifts, memberships, favors, and/or other  
22 means including status, title, and promotion.  
23  
24

25 158) The Plaintiff claims that TajMania Entertainment and its members used  
26 fraudulent and extortive means to gain access to Ms. O'Toole's works, and that  
27 those works were used for financial benefits.  
28

1 159) **Claim #8 Right of Publicity / Invasion of Privacy** – Plaintiff repeats and  
2 realleges each of the foregoing paragraphs as if fully set forth herein.

3  
4 160) The Plaintiff claims that National Amusements / Nickelodeon Animation et al,  
5 Haynes and TajMania Entertainment all had access to and infiltrated her life  
6 through means of social media and used the photos, images, name, and likeness of  
7 herself, her son, her friends and family, and former supervisors to create characters  
8 that are used in the of *The Loud House Franchise*.

9  
10  
11 161) **Claim #9 Alter Ego / Corporate Responsibility** – Plaintiff repeats and  
12 realleges each of the foregoing paragraphs as if fully set forth herein.

13  
14 162) The Plaintiff asserts that Bob Bakish and Shari Redstone made personal  
15 decisions related to the infringement, and that their positions related to National  
16 Amusements et al are such that cannot be separated from those of the corporation.

17  
18 163) The Plaintiff claims that Shari Redstone was born into the business and has vast  
19 experience in corporate law, the laws surrounding copyright, and of the corporate  
20 responsibilities laid out before her. The Plaintiff further asserts these egregious and  
21 heinous actions were foreseeable, avoidable, and have pierced the corporate veil.  
22

23  
24  
25 **VI. REQUEST FOR RELIEF**  
26  
27  
28

1 164) The Plaintiff is inclined to request a statement of entitlement for relief in the  
2 following areas designated by the Federal Court as proper forms of damages,  
3 remedy and relief as follows:  
4

5 165) Attorney's fees: The Plaintiff reserves the right to request the Defendants herein  
6 this claim pay for attorney's fees in the case that the Plaintiff is able to find proper  
7 legal representation to assist her in the proceedings before the Court, at a rate they  
8 deem appropriate.  
9

10 166) Request for accounting.  
11

12 167) Injunction Relief: The claim asks the court for injunctive relief in accordance  
13 with 15 U.S. Code § 1125 (c)(1))) dilution by blurring and dilution by tarnishment,  
14 Rule 65 of the Federal Rules and Civil Procedure.  
15

16 168) The Plaintiff claims that Rule 65 applies to permanent injunction relief on the  
17 grounds that: the Plaintiff will suffer irreparable injury; that no remedy available at  
18 law could adequately remedy that injury; the balance of hardship tips in the favor  
19 of the Plaintiff.  
20

21 169) Cancellation of registered copyright: The claims request the Court to relieve the  
22 Plaintiff of aggrievance by seeking cancellation of the copyright registration held  
23 by ViacomCBS on behalf of Nickelodeon and *The Loud House Franchise* material  
24 copywrites held therein.  
25  
26  
27  
28

1 170) Supplemental Jurisdiction: This claim of controversy and matters stated herein  
2 are “so related to [the copyright] claims in the action...that they form part of the  
3 same case of controversy under Article III of the United States Constitution,” (28  
4 U.S.C.A. §1367).  
5

6 171) Equitable tolling - Fraudulent concealment and equitable estoppel: The claim  
7 requests the Court acknowledge that equitable tolling occurred on the part of  
8 Defendants, thus attempting to conceal the egregious actions within the  
9 controversy and/or participant(s) misconduct. The Plaintiff asserts that this  
10 unfathomable misconduct was continually sustained the entire period leading up to  
11 the preceding filing. (Jaso v The Coca Cola National Amusements 435 Fed, (5th  
12 cir. 2011)  
13  
14  
15

16 172) The Plaintiff also requests a Lulling agreement to be writing by the Plaintiff as  
17 she found traces of lulling actions and has yet been able to fully explore all the  
18 infringements that have actually occurred. In the spirit of accounting for actuals,  
19 the Plaintiff requests the lulling extend for time and access to inspect warehouses  
20 at any and all locations deemed suitably connected to this controversy.  
21  
22

23 173) Request for investigation for the following civil code: Copyright Infringement -  
24 Criminal offenses: 17 USC 506: Any person who infringes a copyright willfully  
25 shall be punished as provided under section 2319 of title 18, United States Code.  
26  
27  
28

1 174) A public statement of apology on behalf of the Infringing parties to the Plaintiff  
2 admitting their involvement in the infringement and apologizing to her and her  
3 family for the affects their interference in the copyright infringement had on them.  
4

5 **Damages**

6 175) Under the Copyright Act Code the Plaintiff has the right to the following  
7 monetary Damages: Statutory damages §504(c) or Actual damages and Defendants  
8 Profits and the infringer's profits §504(a)–(c), Innocent Infringement §504(c)(2).  
9

10 176) Actual Damages: Under the Copyright Act U.S.C. the Plaintiff has the right to  
11 actual damages incurred, accrued and profited by the DEFENDANTS and their  
12 does named herein the complaint. Pursuant the actions for actual damages the  
13 PLAINTIFF is suing in the amount to be determined at the time of trial.  
14  
15

16 177) Treble Damages: the PLAINTIFF requests the court to award treble damages  
17 for the heinous actions of willful infringement used in this controversy. Willful  
18 Infringement (17 U.S.C. § 504(c)(2)) “a finding of ‘willfulness’ . . . can be based  
19 on either ‘intentional’ behavior, or merely ‘reckless’ behavior.”  
20  
21

22 178) Damages associated with Civil Conspiracy for monetary damages associated  
23 with a Plaintiff's loss of earning capacity in an amount to be determined at trial.  
24

25 179) The United States Supreme Court addresses actual damages in the case of a  
26 PLAINTIFF'S discovery period of statutes, as forgoing any three-year cap on  
27 damages, see the matter of Warner Chappel Music v. Sherman Nealy.  
28



**VII. DEMAND FOR JURY TRIAL**

**Plaintiff hereby requests a jury trial on all issues raised in this complaint.**

**VIII. EXHIBITS**

- Exhibit A WGA Registrations, Copyright Certificate, and Copyright Office emails
- Exhibit B TajMania Entertainment Contract, Penguin Group Letter
- Exhibit C Infringement Examples - Movies
- Exhibit D Infringement Examples - Episodes
- Exhibit E Publicity Rights / Invasion of Privacy Rights Examples

Dated this 25th day of May, 2025

\_\_\_\_\_/s/\_\_\_\_

Alethea O'Toole, Plaintiff in Pro Se